

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

JENNIFER D'HULSTER)
ZACHARY GATHERCOLE)
ASHLEY HARRINGTON)
ANTHONY SCHWEITZER)

Case No. 20-MJ-1436

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 27, 2020 through present in the county of Chester in the
Eastern District of Pennsylvania, the defendant(s) violated:*Code Section*18 U.S.C. Section 1040(a)(2)
18 U.S.C. Section 1341
18 U.S.C. Section 1349*Offense Description*Fraud in connection with major disaster or emergency benefits
Mail fraud
Conspiracy

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.*/s/ Erica Faust**Complainant's signature*

Erica Faust, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/27/2020*/s/ Timothy R. Rice**Judge's signature*City and state: Philadelphia, PA

Timothy R. Rice, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA)	
v.)	Magistrate No. 20-1436
JENNIFER D'HULSTER)	[UNDER SEAL]
ZACHARY GATHERCOLE)	(18 U.S.C. §§ 1040(a)(2) and 2)
ASHLEY HARRINGTON)	(18 U.S.C. § 1341)
ANTHONY SCHWEITZER)	(18 U.S.C. § 1349)

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Erica Faust, being duly sworn, state as follows:

INTRODUCTION

1. I am a Special Agent (SA) with U.S. Department of Labor, Office of the Inspector General (DOL-OIG), Office of Investigations, and have been since September of 2015. I am currently assigned to the Philadelphia Regional Office where I have been involved in investigating violations of identity theft, fraud against the government, and unemployment insurance fraud. I hold a Bachelor's degree in Business Administration. I am a law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by law to conduct investigations and to make arrests for federal felony offenses.

2. I make this affidavit in support of a criminal complaint charging JENNIFER D'HULSTER (D'HULSTER), ZACHARY GATHERCOLE (GATHERCOLE), ASHLEY HARRINGTON (HARRINGTON), and ANTHONY SCHWEITZER (SCHWEITZER), with fraud in connection with major disaster or emergency benefits, in violation of Title 18, United States Code, Section 1040(a)(2), mail fraud, in violation of 18 U.S.C. § 1341, and conspiracy, in violation of Title 18, United States Code, Section 1349.

3. Specifically, as set forth below, I have probable cause to believe that D'HULSTER, GATHERCOLE, HARRINGTON, and SCHWEITZER knowingly conspired to file fraudulent applications for monetary benefits under the Pandemic Unemployment Assistance (PUA) program from the United States government, via the Commonwealth of Pennsylvania, as defined in the Coronavirus Aid, Relief, and Economic Security Act for their associates, incarcerated individuals, and themselves.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter

BACKGROUND

5. On March 13, 2020, the President declared the ongoing COVID-19 pandemic to be an emergency under Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

6. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was signed into law. The CARES Act created the PUA program, which provides unemployment benefits to individuals not eligible for regular unemployment compensation or extended unemployment benefits.

7. The PUA program is administered by the various states, including the Commonwealth of Pennsylvania, but its benefits are funded in part by the federal government. In Pennsylvania, the Pennsylvania Department of Labor and Industry (PA DLI) administers the PUA program.

8. According to the PA DLI, a PUA claim must be made online via the PUA website, <https://pua.benefits.uc.gov>. The applicant must enter personal identification information, including name, date of birth, social security number, email address, telephone number, and a physical address. An applicant must also answer a series of questions that enable the PA DLI to determine the applicant's eligibility and payment amount.

9. An applicant is only eligible to receive weekly PUA benefits if they are unemployed for reasons related to the COVID-19 pandemic. The applicant must certify, under penalty of perjury, that they are able to go to work each day and, if offered a job, the applicant must be able to accept it. An applicant must read and understand the PUA Compensation Handbook, which indicates that any earnings must be reported for each week a person works.

10. If the PA DLI approves an application for PUA benefits, the benefits recipient will receive benefits in the form of checks, electronic fund transfers, or debit cards, and the checks and debit cards are mailed via the United States Postal Service to the physical address that appeared on the application.

11. The recipient of PUA benefits receives a unique Personal Identification Number (PIN) to access the PUA portal each week to certify their unemployment status. Payments for PUA are based on a seven-day period, from Sunday through Saturday. Thus, the benefits recipient must certify every seven days that he or she: was ready, willing and able to work each day; was seeking full time employment; did not refuse any job offers or referrals; and, had reported any employment during the week and the gross pay or other payments received. The weekly certification was required to be completed in a timely

manner. A delay in the weekly certification could result in a delay or denial of further payments.

12. Knowingly making a materially false, fictitious, or fraudulent statement or representation in connection with an application for Pandemic Unemployment Assistance or Federal Pandemic Unemployment Compensation benefits violates Title 18, United States Code, Section 1040(a)(2), which prohibits Fraud in Connection with Emergency Benefits.

PROBABLE CAUSE

HARRINGTON- GATHERCOLE PUA CLAIM

13. On or around May 27, 2020, an application for PA PUA benefits was filed in the name of ZACHARY GATHERCOLE. The application alleged that GATHERCOLE was unemployed due to the COVID-19 pandemic from work week ending April 4, 2020, through work week ending May 23, 2020. The social security number and date of birth on the PUA application matched records for Chester County Prison (CCP) inmate GATHERCOLE. GATHERCOLE has been in CCP custody since on or about August 29, 2019, through the present.

14. The mailing address for GATHERCOLE that appeared on his application is 911 W. Miner Street, West Chester, PA 19382 (Miner Street). The PUA application listed Company 1, of West Chester, Pennsylvania, as GATHERCOLE's last employer and stated that he was employed by Company 1 from January 02, 2019, through March 21, 2020. The PUA application further indicated that GATHERCOLE was laid off from his employment with Company 1 due to COVID-19 related reasons.

15. GATHERCOLE's CCP case file listed ASHLEY HARRINGTON as his

girlfriend and her phone number as 610-357-7279. HARRINGTON is a former employee of Company 1, and currently [as of August 11, 2020] an inmate of CCP. CCP intake records identify HARRINGTON's home address as the Miner Street address and her telephone number as 610-357-7279.

16. According to PA DLI PUA claims data, HARRINGTON filed an application for PUA benefits in her own name on or around June 23, 2020. Her PUA application was filed from IP address 172.58.227.52. This is the same IP address that was used to file the GATHERCOLE application. The phone number listed on both PUA claims is 610-357-7279.

17. On July 27, 2020, this Affiant and another agent interviewed D.S., the owner and operator of Company 1. D.S. stated Company 1 is a family business and that D.S. has worked for Company 1 for more than forty (40) years. D.S. was familiar with all employees and payroll functions of Company 1. D.S. advised that "Zachary Gathercole" was never employed with Company 1. D.S. also advised that although GATHERCOLE never worked for Company 1, D.S. was familiar with GATHERCOLE and knew that GATHERCOLE is HARRINGTON's boyfriend and HARRINGTON is the daughter of D.S.'s office employee. D.S. stated that he/she was aware that GATHERCOLE was currently incarcerated and that HARRINGTON was staying with her father at a home on Miner Street in West Chester, PA.

18. On August 11, 2020, this Affiant and another agent visited HARRINGTON in CCP custody and interviewed her. After agents advised HARRINGTON of her Constitutional rights, HARRINGTON stated that at GATHERCOLE's request, she filed GATHERCOLE's PUA claim while he was incarcerated at CCP. HARRINGTON went

to GATHERCOLE's home address of 523 Lissie Lane, Sadsburyville, PA 19369 (Lissie Lane) and consistently picked up any mail addressed to GATHERCOLE.

HARRINGTON mailed GATHERCOLE's PUA benefit checks to GATHERCOLE in CCP for him to endorse. GATHERCOLE mailed the endorsed checks back to HARRINGTON for her to attempt to cash the checks or deposit them into a bank account.

19. On August 14, 2020, this Affiant and other agents executed a search warrant at HARRINGTON's Miner Street address and seized PUA check stubs in the name of GATHERCOLE, along with handwritten letters from GATHERCOLE to HARRINGTON during GATHERCOLE's incarceration at CCP. In the letters, GATHERCOLE discussed his PUA benefits and how he and HARRINGTON were going to use the money.

20. Based on the information set forth above, there is probable cause to believe that HARRINGTON submitted a PUA application for GATHERCOLE for a period of time when she and GATHERCOLE knew GATHERCOLE was incarcerated and unable to accept work and made the following material false, fictitious, or fraudulent statements or representations:

- a. HARRINGTON falsely represented that she was GATHERCOLE.
- b. HARRINGTON falsely answered "YES" to the question, "If offered a job, are you able and available to accept it?"
- c. HARRINGTON falsely answered "YES" to the question, "Are you unemployed as a direct result of a pandemic or major disaster?"
- d. HARRINGTON falsely stated that GATHERCOLE was a former

employee of Company 1.

e. On GATHERCOLE's behalf and under penalty of perjury, HARRINGTON falsely stated that the representations contained in the application were true and correct.

21. On or around June 2, 2020, the Pennsylvania Treasury Department issued PUA benefit check #1100881490 payable to GATHERCOLE for \$540.00. A copy of the endorsed check shows that on June 23, 2020, an attempt to cash or deposit the check was made. The back of the check was endorsed with the purported signatures of "Zach Gathercole" and "Ashley Harrington."

22. Pennsylvania Treasury Department records show that from approximately May 12, 2020, through approximately June 2, 2020, four bank checks for PUA benefits totaling \$5,005.00 were issued to GATHERCOLE.

23. Pennsylvania Treasury Department records show that from on or around June 8, 2020, through August 3, 2020, GATHERCOLE received PUA benefits deposited onto a US Bank VISA Debit card totaling \$7,325.00.

24. In the CARES Act, the United States government intended to provide major disaster and emergency unemployment benefits to individuals not eligible for regular unemployment compensation or extended unemployment benefits. The PA DLI relied on applicants to the PUA program, which administered the distribution of benefits, to make truthful representations. However, HARRINGTON and GATHERCOLE knowingly conspired to make materially false, fictitious, or fraudulent statements or representations in connection with applications submitted on the PUA website.

D'HULSTER-SCHWEITZER CLAIM

25. CCP provided this Affiant with recordings of phone calls between JENNIFER D'HULSTER and inmate ANTHONY SCHWEITZER. SCHWEITZER used his CCP inmate PIN to call 484-387-0299 and speak to D'HULSTER about filing PUA weekly certifications of unemployment for SCHWEITZER and PUA applications for other individuals. PA DLI unemployment records and law enforcement databases confirm that the number 484-387-0299 is used by D'HULSTER.

26. On June 28, 2020, one of the CCP recorded calls captured D'HULSTER telling SCHWEITZER, "I wonder if they didn't approve your fucking unemployment shit because you put the wrong SSN on there." SCHWEITZER asked, "Which one did you put?" D'HULSTER replied, "I dunno, whatever one you gave me?" Later in the same conversation, SCHWEITZER asked D'HULSTER, "... so what happens, well, what if it come this week? So what happens, you think you put the wrong number in it not gone come?" D'HULSTER replied, "Well if it's the wrong number then they're not gonna approve it." SCHWEITZER asked D'HULSTER, "Like, so why don't you just do another one and do the... like can't you do that way?" D'HULSTER replied, "Yea no, that's not gonna work."

27. On July 2, 2020, SCHWEITZER called D'HULSTER. SCHWEITZER asked, D'HULSTER, "Whatcha money level at?" D'HULSTER replied, "ummmm...5200." D'HULSTER told SCHWEITZER that she just filed her own unemployment insurance claim, which prompted SCHWEITZER to ask D'HULSTER to re-file his PUA claim. D'HULSTER said, "... no I'm not doing yours now because you're in jail." But SCHWEITZER disagreed and said, "Yea but you could still do it." D'HULSTER replied, "No, you're not supposed to get it when you're in jail. I think that's what fucked it up. I

think we fucked it up dude.” SCHWEITZER asked D’HULSTER “So you can’t?” and D’HULSTER replied, “I can’t take it back. I tried. . . . Like take back the weeks that I claimed that I shouldn’t have for you. . . . They’re prolly gonna deny it and then you’re gonna have to re do it but only for the weeks that you were home Which is like two, so.” SCHWEITZER replied, “Yeah, Fuck it, no, I was unemployed for a long time.”

28. When the prison telephone call described in paragraph 27 timed out, SCHWEITZER called D’HULSTER again and asked D’HULSTER “but what about the times I wasn’t working at all?” D’HULSTER replied, “No, because you... I filed for the pandemic unemployment for you which means it doesn’t start until uh, until March 17th and you was already in jail then. Not just regular unemployment.”

29. On July 21, 2020, SCHWEITZER called D’HULSTER. During the call, D’HULSTER stated, “I helped Chelsea file her PA PUA unemployment shit this morning and it wouldn’t even let her go back at all. It said she can’t file ‘til next week. I don’t know what they’re doin with this shit. Yours still didn’t come through, they still owe Braden (inaudible). I still don’t have Davie’s card. I don’t know what the hells going on.” SCHWEITZER replied, “I don’t give a fuck about that money anymore. Shit aint, aint gonna help me with anything so...”

30. PA DLI PUA claims data shows that a PUA claim in SCHWEITZER’s name was filed on or around June 10, 2020 from IP address 69.242.81.41. The provided email address was Jendhulster1027@gmail.com. The provided mailing address was 260 Doe Run Road, Coatesville, PA 19320 (Doe Run), which is the same address provided on D’HULSTER’s PA unemployment insurance claim.

31. On June 21, 2020, SCHWEITZER was incarcerated at CCP. From June 21, 2020,

through the date of this affidavit, SCHWEITZER has remained in custody at CCP.

Nevertheless, although PA DLI had not approved the PUA claim in SCHWEITZER's

name, from on or around June 28, 2020, through on or around August 16, 2020,

D'HULSTER completed fraudulent weekly certifications covering work weeks ending

June 27, 2020, through August 15, 2020 in order for SCHWEITZER to receive PUA

benefits if his claim was approved. D'HULSTER falsely certified that during those work

weeks, SCHWEITZER remained unemployed due to the Pandemic and was available for employment.

32. Based on the information set forth above, there is probable cause to believe that

D'HULSTER submitted fraudulent PUA weekly certifications on behalf of

SCHWEITZER for a period of time when she and SCHWEITZER knew SCHWEITZER

was incarcerated and made the following material false, fictitious, or fraudulent

statements or representations:

a. D'HULSTER falsely represented that she was SCHWEITZER.

b. D'HULSTER falsely represented that SCHWEITZER was unemployed and was available for employment.

c. On behalf of SCHWEITZER and under penalty of perjury, D'HULSTER falsely stated that the representations contained on the weekly certifications were true and correct.

33. Notwithstanding the requirements for PUA benefits under the CARES Act,

D'HULSTER and SCHWEITZER knowingly conspired to make materially false,

fictitious, or fraudulent statements or representations in connection with an application

submitted on the PUA website for benefits for SCHWEITZER and also knowingly and

falsely certified that SCHWEITZER was unemployed due to the Pandemic and available for work after his application for benefits was approved in order for him to continue to receive benefits.

D'HULSTER – GATHERCOLE SCHEME

34. CCP provided this Affiant recordings of prison phone calls between D'HULSTER and GATHERCOLE. GATHERCOLE used his CCP inmate PIN to call D'HULSTER at 484-387-0299 which, as previously stated, is a number known to be used by D'HULSTER. GATHERCOLE and D'HULSTER discussed D'HULSTER filing additional PUA applications, as well as, the collection of identities and establishment of a P.O. Box to use to receive the PUA mailings.

35. On July 9, 2020, GATHERCOLE called D'HULSTER and informed her that “there’s a crazy unemployment check hustle going on, right?” D'HULSTER replied, “Yup I got it.” GATHERCOLE encouraged D'HULSTER to file a claim for benefits for “Dave” and advised D'HULSTER that the money would go onto a card. GATHERCOLE also cautioned that, “if they got his address as something else. You go in and put the address as yours or wherever you want the card to go.” D'HULSTER replied, “Yeah, that’s what I did with Anthony,” apparently referring to SCHWEITZER. GATHERCOLE stated, “Listen, yeah. I did it with me. That’s why I got all these checks keep coming in.” D'HULSTER agreed to file the “Dave” claim and stated that she had his social security number.

36. During the same July 9, 2020 telephone call, GATHERCOLE bragged to D'HULSTER that he was receiving approximately \$700 a week in PUA benefits. GATHERCOLE said, “Yup. And fucking for real for real, um, you could do it for other

people since you know how to do it. You could do it for other people and take your cut from that shit. Girl.” GATHERCOLE told D’HULSTER that people are making around \$11,000 filing claims. GATHERCOLE told D’HULSTER that she could make money and take a cut. GATHERCOLE said, “I’ll give you info for like maybe one or two people that want that shit done. And then you take your little cut. Maybe like 1,000 off each one or something. . . . Ash do it and take her little cut. But I’m saying, you do a lot for me, if you want to do that shit, take your little cut then. You know what I’m saying. Make a thousand dollars for a quick, you know what I’m saying, fucking 10, 15 minutes on a computer or however long it takes.” D’HULSTER acknowledged that she knew how to submit a PUA claim, stating “Yeah, it didn’t, don’t take long at all.”

37. On July 12, 2020, GATHERCOLE called D’HULSTER. During the call, D’HULSTER stated that she had just filed a claim on behalf of GATHERCOLE’s brother. Afterward, GATHERCOLE inquired about the application process. He asked, “Like what happens when you fill it out? Like, it says like uh. Like what does it tell you? Like that you’re eligible? Or does it tell you an amount that they get? Or how does that work?” D’HULSTER replied, “It tells you that you are eligible and then it tells you how many like it will let you know how many weeks you can file for. And then you just got to figure out the amount from there. Like your brother’s is like 15,000 something.”

38. During the same July 12, 2020 telephone call, GATHERCOLE and D’HULSTER discussed the legality of their PUA claims. D’HULSTER stated, “I mean, I feel like if they’re stupid enough to give it to you that’s on them.” GATHERCOLE replied, “Exactly, and the government fucks us enough, so why shouldn’t we get over on the government?” D’HULSTER agreed.

39. On July 13, 2020, GATHERCOLE called D'HULSTER. GATHERCOLE provided a telephone number to D'HULSTER and told her to call and "explain to them the process of the PUA jawb." D'HULSTER agreed to do so. Later in the conversation, GATHERCOLE received confirmation from D'HULSTER that what was needed to apply for PUA benefits was the applicant's name, date of birth, and social security number. GATHERCOLE indicated that he had "four" and "We can do all four of those with just us. Like, I'm saying. The P.O. Box thing. And then all you do is, do your thing on the computer, find out what the amount is that each one is going to get. And we'll just split it down the middle. Four already. We'll just say worst case scenario. And they get, we'll just chalk down lower to three. Three, six, nine, twelve. That's twelve names between us. That's the lowest." D'HULSTER replied, "Yeah that's not bad." GATHERCOLE stated, "Yeah. Like I said, I got four already. Now, do you think I should send them to you in a letter? Do you think that's safer?" D'HULSTER agreed. GATHERCOLE stated, "Ok. I'm a going to put it today. And like I said I got the DOB, I got the whole social, and, and the name. Yup, and I got... that's four. And for real, for real. That's me cutting one person out and just doing it for me and you altogether. Just me and you."

40. During the same July 13, 2020 telephone call, GATHERCOLE inquired about D'HULSTER's commitment to the scheme to fraudulently obtain PUA benefits. GATHERCOLE stated, "One more time. Let me get this 100% clear so I know that we're on the same page. You are 100% in with me on this thing I got going on." D'HULSTER replied, "Yeah." D'HULSTER also responded to GATHERCOLE's inquiry about claims that she had previously submitted for PUA benefits for "Dave," "Anthony," and

“Braden” and she reported that she was able to successfully obtain large amounts of money for “Dave” and “Anthony.”

41. During the same July 13, 2020 telephone call, GATHERCOLE told D’HULSTER to get a cheap post office box to use for the receipt of cards containing PUA benefits. He added, “We got to knock this shit out soon. Before, I’m saying, people start getting hip to that shit.” D’HULSTER agreed, stating “We don’t have a whole lot of time.”

GATHERCOLE and D’HULSTER agreed to a plan in which GATHERCOLE would send a letter to her so that D’HULSTER could “get [her] type on, on the computer or whatever and find out what each one. See what I’m saying, calculate what each one is, how much. And then we will touch base on Monday. And, uh. Just make sure the P.O. Box thing obviously use a name like John Doe or whatever the case may be. You know I mean? Or even if somebody, if you got to use actual info, you get somebody who’s fucked up on bread. You see what I’m saying, somebody who don’t have no money or nothing, and be like ‘Look, if you put the P.O. Box in your name, we’ll give you a couple hundred dollars.” “Yeah, but this shit is almost like foolproof. And we could make 20 or 30 (inaudible).” D’HULSTER agreed.

42. Based on the aforementioned phone calls and information obtained from the investigation, this Affiant has learned that “Dave” is D.D. and is GATHERCOLE’s brother who has been in custody at the State Correctional Institute Phoenixville (SCIP) from on or around March 11, 2020, through the date of this affidavit. SCIP records for D.D. list D’HULSTER as his fiancé and his residential address as the Lissie Lane address, the same as GATHERCOLE.

43. On or around July 11, 2020, an application for PA PUA benefits was filed in the

name of D.D. from IP address 69.242.81.41. The social security number and date of birth on this PUA claim matched records for SCIP inmate D.D. The email address for this claim is Jendhulster1027@gmail.com. The IP address is the same one from which the claim for PUA in SCHWEITZER's name was filed on or around June 10, 2020.

44. Beginning on or around July 11, 2020, D'HULSTER completed weekly certifications covering work weeks ending March 14, 2020, through July 4, 2020, on behalf of D.D.'s PUA claim. D'HULSTER falsely certified that during those work weeks D.D. was unemployed due to the Pandemic, but was available for employment.

45. Based on the information set forth above, there is probable cause to believe that D'HULSTER submitted a fraudulent PUA application and weekly certifications D.D. for a period of time when she knew D.D. was incarcerated and unable to accept work and made the following material false, fictitious, or fraudulent statements or representations:

- a. D'HULSTER falsely represented that she was D.D.
- b. D'HULSTER falsely stated that D.D. was unemployed as a direct result of a pandemic or major disaster.
- c. D'HULSTER falsely stated that D.D. was available to work if offered a job.
- d. On D.D.'s behalf and under penalty of perjury, D'HULSTER falsely stated that the representations contained in the application and weekly certifications were true and correct.

46. Pennsylvania Treasury Department records show that on or about July 13, 2020, PUA benefits totaling \$11,410 were deposited onto an US Bank VISA Debit card for D.D.

47. Notwithstanding the requirements for PUA benefits under the CARES Act, D'HULSTER and GATHERCOLE knowingly conspired to make materially false,

fictitious, or fraudulent statements or representations in connection with the application submitted on the PUA website for benefits for D.D. and also knowingly and falsely certified that D.D. was unemployed due to the Pandemic and available for work after his application for benefits was approved in order for him to continue to receive benefits.

ADDITIONAL INFORMATION

48. On August 14, 2020, CCP corrections officers searched the jail cell of GATHERCOLE. GATHERCOLE was the sole occupant of this jail cell. The search produced the following records:

a. A red address book bearing the name “Zachary Gathercole” on the front. The address book contained: (1) a page that reads “Pandemic Unemployment Assistance” (uc.pa.gov). Jen 260 Doe Run Rd, C-ville PA 19380.;” (2) a list of CCP intake numbers for seven additional current and former CCP inmates, along with a list of five (5) identities, including names, dates of birth, and social security numbers.

b. A handwritten note with the name “JEN” at the top that states: “I was thinkin also Jen, maybe we can put 5 up for Dave, you (illegible). It all set for him ahead of time. (car illegible) (house ready) (1000 for clothes) (you pay fines for him) then we bail me out you get \$ fur your own spot, & plus w/ the PUA shit me & you are goin into 2gether, If we – ur – to we can put majority of \$ back bit hes home (still 3 months) & also just tell him I filled it out for you – you got 2,500 heres 1300 on books & I’ll hold 500 for when you touch. All the while well be banking & stackn & hell never know!!”

c. A handwritten note with the name “JEN” at the top that states: “Did n-e of those chicks send # & addresses yet? Ne more P.O. Box info yet? Each amount & requirements 2 open it?”

d. A handwritten letter addressed to “Zach” from “Jenn” that states, “... I still haven’t got either of them cards so IDK WTF is going on. B & Ant haven’t gotten shit in wks either. I looked into that other shit too but the slackin ass government hasn’t made any final decisions yet so we aint getting shit out here but regular \$170 a wk unemployment right now.”

e. A handwritten note with the name “TIA” at the top that states: “P.U.A. checks? Other peoples info & if got you (DOB/name/SS).”

CONCLUSION

49. Based on the above information, your Affiant submits that there is probable cause to believe that D’HULSTER, GATHERCOLE, HARRINGTON, and SCHWEITZER conspired to commit mail fraud, in violation of 18 U.S.C. § 1349, committed mail fraud, in violation of 18 U.S.C. § 1341, and committed fraud in connection with a major disaster or emergency benefit, in violation of 18 U.S.C. §§ 1040(a)(2) and 2.

Respectfully submitted,

/s/ Erica Faust
Erica Faust, Special Agent
U.S. Department of Labor
Office of the Inspector General

Subscribed and sworn to before me
on this 27th day of August, 2020

/s/ Timothy R. Rice
HONORABLE TIMOTHY R. RICE
UNITED STATES MAGISTRATE JUDGE